

FRIENDS of BLACKWATER

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Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
Office of Energy Projects
888 1st Street NE
Washington, DC 20426

December 21, 2018

Subject: Project No. 14889-000-West Virginia
Big Run Pump Storage Hydroelectric Project
FreedomWorks, LLC

Dear Secretary Bose:

Friends of Blackwater (FOB) objects to all aspects of this proposed Project, hereinafter designated as the “Big Run Energy Storage Industrial Complex Proposal,” or “the Proposal.” FOB asks that FERC refuse all requests for authorization of any sort in connection with the Proposal.

The activities that are described in the Proposal would unacceptably degrade and industrialize a major regional recreational resource and nature sanctuary, including a large and important recreational portion of the Monongahela National Forest.

The Proposal activities and facilities would include construction and operation of a massive industrial site that would cause major injuries to the Blackwater Canyon and the Cheat and Blackwater Rivers.

The upper reservoir at Big Run would be 1.5 miles wide (1200 acres), and the lower reservoir at trout stream Mill Run would be over 1000 acres, connected by penstocks that will run 7000 feet. Massive power houses, concrete dams, surge loops, spillways, and power lines are part of the project.

More specifically, the Proposal includes construction and operation of a very large industrial installation, including industrial lighting, massive power houses, 2 large reservoirs, huge penstocks (metal pipes full of water under high pressure), 2 large concrete dams, 2 large surge loops and spillways, and a 17-mile long Intertie power line.

These many features of the Proposal's activities would severely and negatively impact and degrade public lands, federal and state; public and private viewsheds of the Blackwater Canyon; substantial rare and endangered wildlife habitat; multiple historic sites; the Blackwater River and tributaries; Cheat River tributaries; multiple recreational trails; currently used roads. At least 900 acres of The Monongahela National Forest would be directly affected, and critical viewsheds from Blackwater Falls State Park would be degraded

The Proposal would be a blow to the critical and vulnerable local outdoor recreation, scenic, and heritage recreation economy.

Here is a summary of the many reasons this Proposal must be rejected.

Critical viewsheds will be degraded: Based on the maps that are currently available, the disfiguring industrial infrastructure and activity associated with this project are likely to be visible from such popular vantage points as Olson Fire Tower, from Lindy Point looking toward the North Flank of Blackwater Canyon, and Centennial Park on Backbone Mountain, as well as numerous other places in the region..

The scenic viewsheds of this region are major tourism assets, and huge industrial ponds and bunker-like buildings are the antithesis of what customers of the region's tourism and second-home industries value.

Lights around the installations would light up the night sky, destroying Blackwater Falls State Park's initiative to create a "dark sky" designation for the Park.

Major rivers would be degraded: the proposed Pumped-Storage Facility would impound and negatively impact stream function in the Big Run watershed of the Blackwater River; and the Tier 3 trout stream, Mill Run of the Cheat River; and Tub Run which is the subject of extensive recent restoration effort. Overflows from the Big Run impoundment would go into the Blackwater River, and those from Mill Run into the Cheat.

The massive penstocks that are part of the Proposal, and clearing and excavation for these, would impact water flow in Big Run Bog, a sensitive National Natural Landmark on the Monongahela National Forest.

Substantial cultural resources would be degraded: The Proposal requires a powerline that would likely impact the historic Blackwater Industrial Complex. The Blackwater Industrial Complex is eligible for the National Register of Historic places, and includes the Canyon Rail-Trail and historic coke ovens, which are located on federal land. Based on the maps available, it appears that the Proposal could also degrade historic buildings along the Sugarlands Road, including the Sugarlands Church of the Brethren and Cemetery. Native American sites along the Cheat River at Horseshoe Bend could also be damaged.

Severe acid mine drainage and subsidence risks are associated with the Proposal area: The Proposal's planned 1.5 mile-wide proposed Big Run Reservoir is

now an Abandoned Mine Lands reclamation site, which is underlain by old mine works, producing large amounts of acid mine drainage (AMD) pollution. This is the largest source of AMD in the upper Cheat watershed, and the water is polluted with heavy and corrosive metals. Disturbances associated with the massive Proposal could negatively impact the capped surface, exposing sequestered toxic materials, and disturb the unstable subsurface of old mine tunnels, leading to more breakouts and increasing pollution in the Blackwater River.

Flooding and drainage risks from increased precipitation are already growing risks in the region: Building massive major reservoirs at the top of Backbone Mountain, at a time when regional precipitation is the highest since 1899, is asking for trouble. The towns of Hendricks, Hambleton, Parsons, and St. George lived through a tragic flood in 1985, and residents don't want it to happen again. Multiple spillways from the Proposal's reservoirs would run across Forest Service land, causing soil disturbance and erosion risks.

Rare and endangered wildlife will be substantially and illegally injured: The Proposal activities threaten and to injure the following wildlife species of particular concern: the Indiana bat, Virginia big-eared bat, Cheat Mountain salamander, WV northern flying squirrel, and brook trout in Mill Run. The Monongahela National Forest plan prohibits activities that impact such species.

Important trails would be damaged: important and popular existing recreational trails that lead off of Forest Road 18 would be just below the Proposal's huge Big Run Reservoir, and would be damaged and lose their wild-lands recreational appeal. They include the long-distance Allegheny Trail, Canyon Rim Trail, Limerock Trail, and trails at the Olson Fire Tower, such as the Fansler Trail.

Corridor H/Route 219 and nearby Towns would be negatively impacted: Current Route 219, the West Virginia Music Trail, and the planned Corridor H four-lane highway, would be "crossed" by this Proposal. Tunneling under these roads near the Tucker County High School could be especially dangerous. The Proposal includes a major *17-mile-long high-elevation powerline corridor* going east from Backbone Mountain at the High School to the Mount Storm power plant. The Proposal maps route the line through either the historic Blackwater Industrial Complex at Coketon/Douglas, or through the town of Thomas. Either route would cause major negative impacts to these recreation-based communities and their historic sites.

The Proposal is riddled with inaccuracies and inadequacies, displaying a complete lack of familiarity with the area and lack of due diligence: for example, the interested political subdivision/entities information section omits WV Division of Highways, WV Department of Environmental Protection Abandoned Mine Lands, Blackwater Falls State Park, Town of Hendricks, Town of Parsons, Town of Saint George, Tucker County flood plain manager, Tucker County Development Office, Absentee Shawnee Tribe of Oklahoma (who work cooperatively with archaeologists on the Monongahela National Forest), WV State Historic Preservation Office, National

Park Service (who are responsible for National Natural Landmark Big Run Bog), Bureau of Land Management.

Additionally, we find the following problems with the permit application from FreedomWorks accepted September 26 for FERC Project P-14889:

Reservoir size and construction material: no size has been specified, and the types of material listed in the application are inadequate for large dams in an area of very high rainfall.

Transmission Lines: application states that the project is located near Nedpower, but is in fact over 20 miles away. This is a basic factual inaccuracy, indicating a lack of precision and attention in the application.

Lands and waters of the United States: The Blackwater River in the Canyon has been considered for inclusion in the national Wild and Scenic River system in a study by the Monongahela National Forest. It will be impacted and dewatered by this proposal. The proposal states this project is in the public interest because of its potential to counteract the local downturn in coal employment. In fact, 200 coal miners are employed in Tucker County, and there has been no statistically significant decline in local coal production or employment over the past several decades.

Costs: proposed costs for studies on public lands are inadequate. Comments submitted by the Forest Service note that FreedomWorks' proposal has not taken into account studies on recreational impacts, geology, or fisheries, suggesting that actual costs will be much higher than projected.

Fisheries: The catch and release trout fishery in the Blackwater River will be impacted. Mill Run, a Tier 3 protected trout stream, will be an area of particular concern, and extensive studies should be conducted on Mill Run. There is precedent to suggest that impacting a trout stream requires a robust mitigation and compensation plan, which the proposal currently lacks.

Endangered and rare species: The proposal does not mention impacts to the National Natural Landmark Big Run Bog, which is an ecologically sensitive area that is home to many species of rare flora and fauna. This area is protected by the National Park System, on the Monongahela National Forest. Three federally listed bats have been found near the project area, along with the federally threatened Cheat Mountain salamander.

The public interest application statement about the decline in coal jobs is not correct. Coal mining jobs increased in Tucker County between 2009 and 2015, according to the Mine Safety and Health Administration. The West Virginia Office of Miners' Health Safety and Training can support the same trend over multiple decades. The 1995 report lists 19 miners employed in Tucker County. In 2017 there were over 200. References at WV-MHS&T records here: <http://www.wvminesafety.org/STATS.HTM>

Thank you for accepting our comments. We ask to be notified of any proceedings or actions by FERC in connection with this proposal.

Sincerely,



Judith S. Rodd Director
Friends of Blackwater, Inc.